

# Exhibit N

CASE NO.: 1:23-CV-878

RULE 30(b)(6) DEPOSITION OF  
LEAGUE OF WOMEN VOTERS OF NORTH CAROLINA'S  
DESIGNATED REPRESENTATIVE,  
JENNIFER McMILLAN RUBIN  
(Taken by Defendants)  
Durham, North Carolina  
Wednesday, March 19, 2025

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## APPEARANCES

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RULE 30(b)(6) DEPOSITION OF LEAGUE OF WOMEN  
VOTERS OF NORTH CAROLINA'S DESIGNATED REPRESENTATIVE,  
JENNIFER McMILLAN RUBIN, a witness called on behalf of  
Defendants, before Lisa A. DeGroat, RPR, Notary  
Public, in and for the State of North Carolina, at the  
offices of Southern Coalition for Social Justice,  
5517 Durham-Chapel Hill Boulevard, Durham,  
North Carolina, on Wednesday, March 19, 2025,  
commencing at 9:56 a.m.

1 related to the case.

2 Q. Do you remember what specific documentation  
3 you might have looked at?

4 A. I don't.

5 Q. That's fine.

6 Did you speak to anyone besides your  
7 counsel?

8 A. No.

9 Q. Is the League a nonprofit organization?

10 A. Yes, it is.

11 Q. Do you know if it's a 501(c)(3)?

12 A. It is. We have a 501(c)(4), but we -- this  
13 is -- we're -- we have both, 501(c)(3) and 501(c)(4)  
14 as part of -- as part of the state league.

15 Q. Okay. And the 501(c)(4) is a separate  
16 entity?

17 A. Uh-huh.

18 Q. Okay. And what is that entity called?

19 A. It is called League of Women Voters of  
20 North Carolina Advocacy.

21 Q. Can you tell me a little bit about the  
22 structure of the League?

23 A. Sure. We have three tiers writ large, as  
24 far as the League goes. The national organization,  
25 the League of Women Voters of the U.S., the state

1 organization, which is the League of Women Voters of  
2 North Carolina, and then local leagues. We have 15  
3 local leagues throughout the state. We have almost  
4 2,000 members around the state.

5 When you join the league, as a local league  
6 member, you also become a member of the state league  
7 and the national organization. So you receive  
8 information from all three entities, the local, the  
9 state and the national organization.

10 Q. And does the League -- and, again, I'm  
11 referring to the North Carolina --

12 A. Uh-huh.

13 Q. -- state affiliate -- have a board?

14 A. Yes, it does.

15 Q. Okay. And who is on it?

16 A. We have officers. Do you need -- do you  
17 need their names, or do you just want the titles of  
18 what they do?

19 Q. Both, if you can.

20 A. Okay. Sure. So I'm the president. We have  
21 a vice president, Marian Lewin. Our treasurer is Mary  
22 Thompson. Our secretary is Sandra Mowell.

23 And then we have directors on the board;  
24 Regan Aduddell, Tiffany Canaday. Have to make sure I  
25 don't forget anybody. Suzanne Fisher, Rebecca Klase,

1 A. Uh-huh.

2 Q. And I think you mentioned that the state  
3 affiliate -- which, to clarify for the record, I'm --  
4 when I say, "the state affiliate," I'm referring to  
5 the League of Women Voters of North Carolina, Inc. --  
6 partners with local leagues. Did I hear that  
7 correctly?

8 A. Yes, we can. Uh-huh.

9 Q. Are there any other partnerships that the  
10 state affiliate does?

11 A. Yes. We partner with other  
12 Democracy-focused organizations on events or on  
13 activities or just sharing information.

14 Q. Okay. And what is a Democracy-focused  
15 organization?

16 A. Well, we're -- our focus is on helping to  
17 empower voters and defend Democracy. Those are --  
18 that's our mission.

19 For us that means we try to empower voters  
20 with the information that they need to vote, and we  
21 have mechanisms and programming that helps bring  
22 information to voters so that they're informed voters.

23 They're aware of issues impacting them and  
24 that they have the information that they need, both  
25 that they understand the issues and that they know how

1 to vote and make sure that their vote counts.

2 Q. Okay. So that led into my next question --

3 A. Uh-huh.

4 Q. -- which was: What is the League's mission?

5 A. Well, it's -- the League's mission -- writ  
6 large the League organization -- the state and  
7 national organization is defending Democracy and  
8 empowering voters, and it means just what I said  
9 earlier, that it -- we try to empower voters with the  
10 information that they need to vote, with the  
11 information about elections, as far as candidates,  
12 issues, what's on their ballot.

13 We do that through our VOTE411.org website  
14 and other local league activities. And then we make  
15 sure that they know how to vote legally, what the  
16 requirements are, what the laws are governing voting,  
17 so that their vote will count.

18 Q. Okay. So how does the state affiliate go  
19 about defending Democracy?

20 A. Well, we look at -- at what's happening.  
21 And if there are issues that affect civil rights or  
22 are affecting, you know, impinging on Democracy, we  
23 take positions about those -- about those activities  
24 or those actions.

25 Q. What sorts of programming does the state



1 affiliate have for that?

2 A. Well, it really depends. I mean, we --

3 we -- like I said, we did one about the federal

4 judiciary to help people understand the importance of

5 voting in the judicial races.

6 We have -- we help people understand the --

7 the statewide issues that are on the ballot. The

8 constitutional amendment that was on the ballot last

9 year, we helped to communicate about that.

10 So we -- we look at the -- at the issues

11 affecting voters and what they need to vote on and

12 make sure that they're aware of what those are.

13 Q. And when you say, "inform voters" --

14 A. Uh-huh.

15 Q. -- do you mean North Carolinians generally?

16 A. Yes.

17 Q. And I believe another part of the mission

18 you highlighted was empowering voters --

19 A. Uh-huh.

20 Q. -- is that right?

21 A. Uh-huh.

22 Q. How does -- strike that. Let me start over.

23 Aside from VOTE411 and local league

24 activities, what work does the state affiliate do to

25 empower voters?

1 A. Well, we do a lot of -- we have newsletters  
2 that provide information about issues. We have a  
3 legislative update that comes out periodically that  
4 helps our members understand what legislation is being  
5 proposed or what legislation is being evaluated or  
6 voted on in the state legislature.

7 What else? We -- I mean, everything we do  
8 helps voters understand the issues that they need  
9 to -- to be aware of to be informed voters.

10 Q. How does the League measure success of that  
11 educational programming?

12 MS. WITTE: Objection; form.

13 THE WITNESS: It's -- we look at how  
14 many voters we register. We register voters. We  
15 hold events, and we try to evaluate -- you know,  
16 we look at how many people turned out.

17 We do evaluate turnout in areas where  
18 we have VOTE411 active and try to see whether  
19 we've reached voters, how many voters have  
20 actually used that -- that tool.

21 So we -- we can tell how many people  
22 have logged into VOTE411 to find out information  
23 about voting. So we kind of track the usage of  
24 that tool.

25 BY MS. HOLT:

1 Q. Okay. When did the state affiliates start  
2 using VOTE411?

3 A. I do not know. It's been around for a  
4 while. It's a national program. It's national in  
5 reach. So I don't exactly know when it started.  
6 Before my time.

7 Q. Okay. And what sorts of information does  
8 VOTE411 provide?

9 A. It provides pretty much everything you need  
10 to know. When you log into VOTE411, you can -- you  
11 put your address in. It will give your voting -- your  
12 polling place. It will tell you dates and times for  
13 early voting. It will give you a sample ballot.

14 And it also includes questions to  
15 candidates, who hopefully fill those out. And then  
16 voters can actually compare answers from different  
17 candidates, which we publish unedited from the  
18 candidates themselves.

19 Q. How is the information on the VOTE411  
20 platform different than what the state board of  
21 elections provides?

22 MS. WITTE: Objection; form.

23 THE WITNESS: It's very similar. I  
24 mean, the state board of elections doesn't  
25 provide candidate information or the questions

1 can't. I'd have to think about it.

2 Q. Okay. And are these questions for  
3 candidates submitted in primary elections --

4 A. Yes.

5 Q. -- and general elections?

6 A. Yes.

7 Q. Okay. In -- let's see. What sorts of  
8 programs does the state affiliate have that's targeted  
9 to 18 to 25-year-olds?

10 A. Well, again, we provide resources for the  
11 local leagues. So the local leagues are the ones who  
12 do on-campus work, but we provide resources for them.

13 So, for example, in the last election we had  
14 materials for local leagues to use when they did  
15 campus outreach. You know, how to vote, what you need  
16 to know to vote.

17 We had little bracelets that said, "Vote."  
18 We had materials to encourage voting. So we provided  
19 those materials.

20 The local leagues did the actual  
21 on-the-ground work in -- on campuses with young people  
22 or events where people were.

23 Q. Do you know if the local leagues partner  
24 with universities or colleges in their counties?

25 A. They can.

1 we have with college students, but the  
2 information is basically the same. So I  
3 couldn't -- I couldn't tease that out  
4 necessarily.

5 BY MS. HOLT:

6 Q. Does the state affiliate receive any grants  
7 targeted to college students?

8 A. We see -- we receive grants, and part of  
9 that money is used to target college students or to  
10 target programming in college campuses and college  
11 students.

12 Q. And what part of that money is used to  
13 target?

14 A. Again, it's -- it depends on what the local  
15 league is -- does. I mean, we include that as part of  
16 our outreach, that -- you know, getting information to  
17 college students is a really important objective of  
18 ours, but it really depends on what the local league's  
19 priorities are.

20 And some local leagues don't have college  
21 campuses in their -- in their neck of the woods. So  
22 they would not be involved in that, but others do.

23 Q. So is it fair to say that the voter  
24 resources that are provided to college students are  
25 generally the same as the resources provided to other

1 voters?

2 MS. WITTE: Objection; form.

3 THE WITNESS: The same in what regard?

4 BY MS. HOLT:

5 Q. Is the information provided to college  
6 students the same as what's provided to other North  
7 Carolinians?

8 A. It can be. I mean, obviously, we know that  
9 college students, for example, utilize same-day  
10 registration more -- at probably a larger rate than --  
11 a bigger rate than the other -- than the general  
12 population.

13 So that has traditionally been a big part of  
14 our messaging for students, to make sure that they  
15 know that they can register and vote on the same day.  
16 So that -- that is -- you know, that's, you know, part  
17 of our messaging to anybody, but it's particularly  
18 important for college students.

19 Q. Has the state affiliate done any research or  
20 produced any reports on the rates of same-day  
21 registration users at college campuses?

22 MS. WITTE: Objection; form.

23 THE WITNESS: I don't know that we  
24 have. No. We -- but we -- we do -- we do a lot  
25 of -- we have a very extensive county board of

1 elections monitoring program, where our members  
2 go to county boards of elections to monitor  
3 canvas and monitor voting, the process of  
4 validating votes and looking at votes.

5 So they would get a sense perhaps at  
6 those meetings of, you know, how many people  
7 utilize same-day registration.

8 BY MS. HOLT:

9 Q. Is -- how -- is the number of people who  
10 utilize same-day registration something that the state  
11 affiliate tracks over election cycles?

12 MS. WITTE: Objection; form.

13 THE WITNESS: No. I mean, I don't  
14 think we have the capacity to track that  
15 information.

16 Q. And the county board of elections monitoring  
17 program that you mentioned --

18 A. Uh-huh.

19 Q. -- is that run by the state affiliate?

20 A. That is organized by the state affiliate.  
21 The volunteers come from the local leagues. So we  
22 provide support training and -- and forms for them to  
23 fill out, and we track that information very  
24 carefully. It comes back to us from the county board  
25 of elections monitors.

1 day.

2 We would include vote-by-mail information.  
3 So that all would be provided to -- to any audience.  
4 So, as far as segregating, you know, we just provide  
5 this information to these voters, we provide all the  
6 information to every voter.

7 Q. Okay. So does the state affiliate have any  
8 specific handouts or -- or pamphlets that are specific  
9 as to voting on a college campus?

10 A. As to voting?

11 Q. (NODS HEAD UP AND DOWN.)

12 A. We provide that information. The local  
13 leagues can tailor that for college campuses, if they  
14 would like to. They can insert, like, polling places.  
15 They can insert local information. They can tailor  
16 that to their college campuses. We can't do that at  
17 the state level.

18 Q. Do you know what the local leagues are doing  
19 on college campuses?

20 A. Generally, yes.

21 Q. If I had specific questions about that,  
22 would I need to ask the local leagues?

23 A. Yeah, I think so. I mean, I could tell you  
24 what activities we do on local campuses, but, as far  
25 as, you know, specific events or if they were holding



1 candidate forums on college campuses, they would have  
2 to tell you that specific information.

3 Q. And, aside from college campuses, are you  
4 aware of any other events or activities by the local  
5 leagues directed at 18 to 25-year-olds?

6 A. Sure. We have -- we do tabling at events.  
7 We register voters at restaurants and bars. So we --  
8 we try to go where young people are to make sure that  
9 we can, you know, make -- make it easy for them to  
10 register to vote.

11 Q. And when you say, "we go to colleges and  
12 bars," are you referring to the state affiliate or the  
13 local leagues?

14 A. The local leagues.

15 MS. HOLT: Let's see. I'd like to show  
16 you what's going to be marked as Exhibit 5. I  
17 thought you were --

18 MS. RIGGINS: Exhibit 5. Sorry.

19 (DEFENDANTS' EXHIBIT 5 WAS MARKED FOR  
20 IDENTIFICATION.)

21 BY MS. HOLT:

22 Q. Have you seen this document before?

23 A. Yes, I believe so.

24 Q. Sure.

25 A. I'm not sure.

1 MS. WITTE: Objection; form.

2 THE WITNESS: I don't -- I know there  
3 was a numbered memo that came out that had some  
4 impact that appeared to address some of that.

5 BY MS. HOLT:

6 Q. So the change of moving from two mailers to  
7 one --

8 A. Uh-huh.

9 Q. -- who does that change harm?

10 MS. WITTE: Objection; form.

11 THE WITNESS: It harms people who make  
12 a mistake on their voter registration or who  
13 write down a physical address as opposed to a  
14 mailing address.

15 It also harms people who have  
16 unreliable mail delivery or people who don't  
17 check mailboxes and don't -- don't have an  
18 opportunity to see their mail.

19 BY MS. HOLT:

20 Q. Is that -- when you say, "people," are you  
21 referring to North Carolinians generally?

22 A. Yes.

23 Q. And how has the state affiliate been harmed  
24 by the SDR mailer provision of 747?

25 A. Well, we have -- we have limited resources

1 as a nonprofit organization, and so we needed to  
2 change our messaging and adapt to this new regulation,  
3 the new requirements, the new processes, and provide  
4 that information to voters.

5 So it involved us having to tailor  
6 information and change a lot of our voting information  
7 that we distribute to -- throughout the state to make  
8 sure that we had accurate information for voters.

9 Q. And when you say, "change the  
10 information" --

11 A. Uh-huh.

12 Q. -- what specifically are you referring to?

13 A. Well, the process. When the process  
14 changed, we needed to change what we were saying about  
15 that process.

16 Q. Does that include the information that you  
17 provided to the local leagues?

18 A. Yes.

19 Q. Does that include the 411?

20 A. I think what VOTE411 did was just refer back  
21 to the State Board of Elections' website. So I  
22 don't -- I don't know that we updated, but 411 is  
23 usually around election time.

24 So I'm not sure at this point in time those  
25 changes would have made any difference, because I

1 don't think VOTE411 was -- I don't -- I don't know  
2 when -- it goes live when there are elections. So I  
3 don't know when those changes would have been made.

4 Q. Did the state affiliate have to spend any  
5 more money as a result of the SDR provision of 747?

6 A. Yes. We had to target more money from  
7 our -- our available budget to redo and provide more  
8 outreach to voters, particularly voters on college  
9 campuses that use same-day registration a lot, to make  
10 sure that they knew what the process was and to  
11 emphasize that they need to get their address correct.

12 Q. Sure. And did the state affiliate do that  
13 college outreach, or was that done through the local  
14 leagues?

15 A. It was done through the local leagues.

16 Q. Did the state affiliate have to undertake  
17 more advocacy work as a result of the SDR provision of  
18 747?

19 A. We had to do more training of our  
20 volunteers. We did -- we have a number of different  
21 statewide election teams that are made up of people  
22 who in their local leagues just focus on elections.  
23 They're called voter services folks.

24 And we have teams and meetings and training  
25 sessions for those -- for those individuals. And we

1 had to do more of that training just to update them on  
2 these changes.)

3 Q. Who hosts those training sessions?

4 A. The state league does. Different people  
5 within the state league.)

6 Q. Before 747 did the state affiliate conduct  
7 training sessions before elections?

8 A. Yes.)

9 Q. Whenever there's a change in an election law  
10 does the state affiliate provide trainings on that  
11 change?

12 A. Yes.)

13 Q. And anytime there's a change in an election  
14 law does the state affiliate spend more money to  
15 inform voters?

16 A. We do. It depends -- I mean, we felt that  
17 this change particularly impacted young voters. So we  
18 spent a lot of time, you know, helping our local  
19 leagues understand that their outreach to young voters  
20 needed to include information about making sure that  
21 their address was correct, the fact that their vote  
22 could be discarded if their postcard was returned  
23 undeliverable.)

24 So we -- we spent a little more time --  
25 anything that potentially can -- can discount a vote,

1 we spend a little more time on that.

2 Q. Did the state affiliate spend more time on  
3 the SDR provisions of 747 than it did voter ID?

4 A. Probably, yes.

5 Q. And how does the SDR provision of 747 impact  
6 the League's core mission?

7 A. Well, our core mission is to make sure that  
8 people vote. So we want to get people to the poles.  
9 We want to make it as simple as possible. We want to  
10 make it legal.

11 So that would -- that affects our ability to  
12 make sure that that happens. So anything that is a  
13 barrier -- as we said before, is a barrier to voting  
14 we would definitely pay attention to.

15 Q. How does the state affiliate know that SDR  
16 affects young voters?

17 MS. WITTE: Objection; form.

18 THE WITNESS: That's what we understand  
19 based on experience of people who do the tracking  
20 of voting. We -- that's -- that was our  
21 understanding.

22 And from our experience, talking to  
23 voters on college campuses, that's one way that  
24 they prefer to vote. They prefer to register  
25 same day and vote the same day.